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June 6, 2012

Via ECF

Chief Magistrate Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza, East
Brooklyn, NY 11201

Re: Rodriguez v. the City of New York
P.A. Jr. v City of New York
Alford v City of New York
10 CV 4661 and 11 CV 1583

Dear Judge Gold:

Pursuant to Your Honor's Order, the following schedule has been set for the depositions of the party witnesses:

Name	Date
Dr. Plotnick	6/14
Carline Anderson	6/19
Robert Salemi	6/20
John McLaughlin	6/26
Blanca Carrera	6/28
Patrick Alford	7/2
Patrick Alford	7/3
Sharice Scott, Jake Nixon	7/9
Deborah Pride, Rose Sosa	7/12
Emmanuel Okon	7/16

Omar Lofton	7/17
Zanette Sargeant	7/18
Natalia Rosado	7/19
Susan Pope	7/25
Zoilla Vilalta	7/26

Given the number of days when one or more of plaintiffs' counsel is unavailable, I doubt we can complete the non-party depositions in July. We will certainly try to do so in the handful of days which remain in the month. In addition, I am advised that August is not good for two firms. I apologize that the non-party depositions have not yet been scheduled, but I believe that all parties will work together on getting these scheduled expeditiously.

Thank you.

Respectfully submitted,
BARRY, MCTIERNAN & MOORE

By: Suzanne M. Halbardier
Suzanne M. Halbardier

cc: Via ECF
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